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DOC #:

DATE FILED: 02/19/2008

U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

MEMO ENDORSED

February 19, 2008

**BY FAX**

Honorable Deborah A. Batts, Jr.  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: United States v. Michelle Ramirez  
07 Cr. 935 (DAB)

Dear Judge Batts:

The Government writes to respectfully request that the upcoming pretrial conference in this case be adjourned for two weeks and that time be excluded, pursuant to 18 U.S.C. § 3161(h)(8)(A), from Monday, February 25, 2008, to Monday, March 10, 2008, in the interests of justice pursuant to the Speedy Trial Act.

A pretrial conference was previously scheduled for Monday, February 25, 2008, at 10:30 am. However, the Government and the defense are currently engaging in the very final stages of plea discussions, which the parties expect will be complete in the next 2 weeks. The Government therefore requests that the conference be adjourned to March 10, 2008, and that time be excluded until then, because such an exclusion of time will enable the defendant to continue such plea discussions with the Government regarding a possible disposition of this case without trial. Accordingly, excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial.

SO ORDERED

Deborah A. Batts

DEBORAH A. BATTS  
UNITED STATES DISTRICT JUDGE

The conference is now scheduled  
for March 10, 2008 at 11:00 am.

GRANTED  
2/19/2008

Honorable Deborah A. Batts  
February 19, 2008  
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I have spoken with Steven Statsinger, Esq., counsel for  
the defendant, who consents to this request.

Respectfully submitted,

MICHAEL J. GARCIA  
United States Attorney

By:



Iris Lan  
Assistant United States Attorney  
(212) 637-2263

cc:  
Steven M. Statsinger, Esq. (By fax)